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25 KARL E. RISINGER, and those similarly situated

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KARL E. RISINGER, an individual, on
behalf of himself and all others similarly
situated,

Plaintiff,

vs.

SOC LLC, a Delaware limited liability
company registered and doing business in
Nevada as SOC NEVADA LLC; SOC-SMG,
INC., a Nevada corporation; DAY &
ZIMMERMAN, INC., a Maryland
corporation; and DOES 1-20, inclusive,

Defendants.

Case No.: 2:12-cv-00063-MMD-PAL

**STIPULATION AND [PROPOSED]
ORDER EXTENDING BRIEFING
SCHEDULE RE MOTION TO
DECERTIFY CLASS
(First Stipulation, Second Request)**



1 WHEREAS, on April 4, 2019, Defendants SOC LLC, SOC-SMG, Inc., and Day &
2 Zimmermann, Inc. ("Defendants") filed their Motion to Decertify Class (ECF No. 344);

3 WHEREAS, key members of Plaintiff Karl E. Risinger's ("Plaintiff") trial counsel team
4 have pre-planned vacations scheduled from April 13 through at least April 19, 2019, and Plaintiff
5 desires to extend the deadline to file an opposition, currently set for April 18, 2019.

6 WHEREAS, on April 10, 2019, Plaintiff filed its First Motion to Extend Time to Respond
7 to Defendants Motion to Decertify Class (ECF No. 347);

8 WHEREAS, on April 11, 2019 the Court denied Plaintiff's First Motion to Extend Time to
9 Respond without prejudice, noting that good cause exists to extend the current deadline, but that
10 the requested extension until resolution of Plaintiff's Motion to Strike (ECF No. 345) was not
11 warranted;

12 WHEREAS, on April 11, 2019 Plaintiff and Defendant (together, the "Parties") agreed to
13 an extension of time for the Parties to file their respective briefs, such that Plaintiff's opposition
14 will be due on May 17, 2019 and Defendants' reply will be due on June 7, 2019;

15 WHEREAS, these requests will not prejudice the overall schedule as the Court has not yet
16 set a trial date;

17 NOW THEREFORE, the parties hereby stipulate and agree to the following:

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1 MOTION SCHEDULE

2 1. The deadline for Plaintiff's Opposition to Defendants' Motion to Decertify Class shall be
3 extended to May 17, 2019;

4 2. The deadline for Defendants' Reply in Support of Motion to Decertify Class shall be
5 extended to June 7, 2019.

6
7 Dated: April 11, 2019

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

8
9 By: /s/ Devin A. McRae
10 SCOTT E. GIZER
11 DEVIN A. MCRAE
Attorneys for Plaintiff

12
13 Dated: April 11, 2019

QUINN EMANUEL URQUHART & SULLIVAN
LLP

14
15 By: /s/ Tara Lee
16 TARA LEE
17 KEITH FORST
MEGHAN MCCAFFREY
Attorneys for Defendants

18
19 In association with:
20 E. LEIF REID
KRISTEN L. MARTINI
Attorneys for Defendants

21 **IT IS SO ORDERED.**

22
23 Dated this 15th day of April, 2019

24 

25 UNITED STATES DISTRICT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I caused the following document(s) to be served to the persons listed below via the Court's Case
3 Management and Electronic Case Filing (CM/ECF) system:

4 **STIPULATION AND [PROPOSED] ORDER EXTENDING BRIEFING SCHEDULE RE
5 MOTION TO DECERTIFY CLASS
6 (First Stipulation, Second Request)**

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40 **I declare under penalty of perjury that the foregoing is true and correct.**

41 DATED this 11th day of April, 2019.

42 /s/ Esther Silverman

43 Esther Silverman